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February 14, 2005

Angela Reynolds, Environmental Officer
Department of Planning & Building
City of Long Beach
333 West Ocean Boulevard, 7th Floor
Long Beach, CA 90802

Re: Sports Park DEIR

Dear Ms. Reynolds,

Thank you for the opportunity to respond to the Draft Environmental Impact Report (DEIR) for the Sports Park proposal for the 56-acre property bounded by Willow and Spring Streets, and California and Orange Avenues ("Willow Springs").

In general, I observed that the specifications for the proposed pay-for-play sports park are written so tightly, with so many financial constraints, and with so little data about future alternatives that the only "feasible" project is the proposed project. Also, the existing property is characterized as being so "blighted" that it must be destroyed in order to save it. My specific comments follow.

Chapter 4.12 - Aesthetics

Topography and watershed features

Most importantly, the loss of the Willow Springs topography and erasure of a historic watershed feature cannot be compensated and runs counter to current City policy. One of the major environmental goals of Long Beach Strategic Plan 2010 is to restore wetlands and riparian habitat (see goal E3). While degraded, the Willow Springs acreage retains unmistakable wetlands character and flora, drains to the Los Angeles River, and has very exciting potential for restoration, education, environmental commerce, and retention of runoff from at least 290 acres and conceivably much more upstream watershed. The proposed project obliterates the topography, significantly reduces permeability, directs runoff into a 54-inch concrete storm drain, and permanently removes heritage wetlands and riparian habitat from the mid-City area.

Admirable efforts have been made in recent years by organizations such as Riverlinks, Friends of the Los Angeles River, and the Los Angeles and San Gabriel Rivers Watershed Council to re-naturalize our watersheds and to link those watersheds to our neighborhoods. The Willow Springs acreage should be utilized in a way that supports these regional planning efforts, embraces the existing topography, and improves management of our water resources through an enlightened multi-purpose project approach.

The alleged blighted condition of the acreage is much less expensive to remedy through restoration, as opposed to cutting and either filling or removing over 700,000 cubic yards of earth. The Willow Springs property currently has about 13 acres of flat land, which would allow creation of several ball fields, structures and parking without obliterating the existing topography. See additional comments in my discussion of Alternatives.

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Parkways

The proposed parkways along the major streets framing the project are too narrow. According to the National Arbor Day Foundation, less than four feet is generally insufficient for growing trees (see Tree City USA Bulletin No.3). The proposed width of four feet is therefore the bare minimum. Parkway should be at least eight feet wide, and preferably 10-12 feet wide, in order to accommodate large trees. The less desirable alternative would be to eliminate the park strip, and make the sidewalks curb-adjacent. Project architects could then consolidate the proposed width of the parkway with the slopes that provide landscape screening for the ball fields or other project features.

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Also, trees should be planted at least 3½ feet from curbs or sidewalks, and the project should specify and budget for root barriers to prevent future damage to concrete infrastructure. Also, mulching or drought-tolerant ground cover would be much preferable to turf, as constant surface watering of turf encourages surface growth of roots, often resulting in damage to curbs and sidewalks.

Chapter 5 – Alternatives

Passive Open Space (Cultural/Nature Park)

The DEIR states (see page 5-6) that the existing topographic conditions on the project site “are the result of significant ground disturbance and earth movement over many decades from activities related to oil production and the deposition of fill. Therefore, the existing condition of the site is not a ‘natural’ condition.”

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While it is true that the existing topographic is disturbed, it is much closer to being in a natural condition than the DEIR would have you believe. The existing topography, in fact, has startling similarity to historic topographic maps of the area, while the proposed project would require redistribution of over 700,000 cubic yards of earth, basically cutting off a mountain in order to dump it into a valley.

The DEIR does not detail the cost of this massive redistribution of earth, nor does it evaluate how the potential cost might be better directed to meet the goals of providing publicly accessible open space and recreational facilities. About 13 acres of the Willow Springs property is currently flat and would not require extensive grading for conversion into ball fields. The remaining acres should be incorporated into a multi-purpose project that recognizes and embraces the original topography and character of the land.

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A multi-purpose project is also more likely to attract public funding in the future, as voters increasingly recognize the value of open space and natural resources. On the other hand, the

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pay-for-play sports park would be a commercial enterprise that would be ineligible for future public funding and would close out future alternatives.

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At the very least, the DEIR should contain a fiscal impact analysis of the proposed pay-for-play sports park that answers key questions, such as:

- How many years will it take for the unknown but roughly estimated \$20-25 million in site preparation and construction costs to be recovered by pay-for-play user fees?
- How is the loss of revenues at existing City and school district facilities compensated, if at all, by the pay-for-play user fees?
- What are the specific costs of regrading the entire 56 acres?
- What are the specific costs of re-engineering the hydrology of the entire 56 acres?
- What are the specific costs of vertically relocating the oil production facilities?
- What is the expected remaining life and related revenues of the oil production facilities?
- What potential funding is available or potentially available from statewide parks propositions or federal wetlands recovery programs?

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Clearly, the absence of projected costs and user fees from the DEIR makes it difficult if not impossible to compare the economic viability of this project with any alternatives.

The DEIR also raises the apparently spurious issue of "inherent land use conflicts" between a passive open space area and ongoing active oil production facilities, stating that public amenities would be required to honor surface easements that provide maintenance and emergency access to the wells (see page 5-8). Please explain how and why such easements would be reduced or excused under the pay-for-play sports park scenario.

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Despite assertions in the DEIR, the Willow Springs property could be adapted to a combination of active and passive uses, could retain the historic topography, could retain the operating oil wells in their present configuration, and could meet the recreation and economic objectives of the project while substantially eliminating blight.

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Sincerely,


David A. Sundstrom

DAVID SUNDSTROM

P-12-1

This comment is introductory and does not contain any substantive statements or questions about the Draft EIR or the analysis therein. Therefore, no further response is necessary.

P-12-2

This comment is introductory and summarizes general observations about the Draft EIR. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein. Therefore, no further response is necessary.

P-12-3

The comment characterizes the project site as “Willow Springs” and offers an opinion regarding the potential of the site to be used for wetlands restoration and other uses. The comment opposes the extensive grading that would be required to implement the Proposed Project, as well as the removal of riparian habitat. The comment states that there is “acreage” that is wetlands in character. Wetlands delineation was prepared in accordance with the criteria of the Army Corps of Engineers and is included in the Draft EIR.

As stated on page 4.4-1 of the Draft EIR, the site receives runoff from 207 upstream acres. As stated on page 4.4-23 of the Draft EIR, the impervious area of the site would increase by 5 percent with implementation of the project, assuming that pervious pavement was not used. As stated on page 4.4-1 of the Draft EIR, the existing runoff drains to the 54-inch storm drain. This storm drain would not be changed (page 4.4-23).

P-12-4

The comment supports naturalizing the watershed on site with minimal changes to the existing topography. This opinion will be made available for consideration by the decision-makers as part of their determination regarding the Proposed Project. The opinion expressed in the comment is more aligned with the cultural/nature park alternative or a hybrid version of natural and active park, than it is with the Proposed Project, which would involve grading and developing the site with several active uses including a Sports Park, youth golf center, and an office building. This comment does not contain any substantive statement or questions about the Draft EIR, and no further response is necessary.

P-12-5

The comment supports wider public parkways along the perimeter streets. The proposed parkways are consistent with City standards and are appropriate in an area that is not now, and is not expected to be in the future, characterized by a large number of pedestrians. The area surrounding the Sports Park site is primarily industrial and heavy business uses. The exception are the cemeteries located south of the site with frontage on Willow Street. The project site does not have frontage on Willow Street and will not change the existing parkway configuration on Willow Street. The planting of street trees will be undertaken with the review and approval of the Department of Public Works.

P-12-6

The comment affirms the information in the Draft EIR summarizing that the existing topographic conditions of the site are the result of significant ground disturbance and earth movement over many decades. The comment further notes that there are similarities between the existing and historic topography of the site. The author supports use of the site that would minimize grading and earth movement. This comment will be made available to the decision-makers for their consideration.

P-12-7

Costs related to implementation and operation of the Proposed Project are not germane to the subject environmental analysis. Effects analyzed under CEQA must be related to a physical change in the environment pursuant to Section 15358(b) of the State CEQA Guidelines. Section 15131(a) of the State CEQA Guidelines further specifies that the economic and social effects of a project shall not be treated as significant effects on the environment. No further response to comments regarding costs are warranted.

The commentor echoes earlier comments and opinions regarding the future use of the site. Please see Responses to Comments P-12-4, P-12-6, and P-12-8.

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The comment asserts that a combination passive and active park project would be more likely to attract public funding than the Proposed Project. This opinion will be made available for consideration by the decision-makers as part of their determination regarding the Proposed Project. The comment further states that a pay-for-play Sports Park would not be eligible for future public funding. Other commercial Sports Park projects in Southern California have been implemented as joint public/private partnerships. The City is currently in the process of identifying a wide range of potential funding sources and does not concur with the commentor's allegation that the project would not be eligible for future public funding.

P-12-9

Costs related to implementation and operation of the Proposed Project are not germane to the subject environmental analysis. Effects analyzed under CEQA must be related to a physical change in the environment pursuant to Section 15358(b) of the State CEQA Guidelines. Section 15131(a) of the State CEQA Guidelines further specifies that economic and social effects of a project shall not be treated as significant effects on the environment. The general discussion of funding provided in Chapter 5.0, Alternatives, is linked to physical improvements (e.g., traffic and infrastructure improvements) that would be required as part of any Proposed Project on site. No further response to comments regarding costs is warranted.

P-12-10

The Proposed Project does not attempt to reduce or excuse the need for surface easements that provide maintenance and emergency access to operating oil wells. The master plan for the Proposed Project is specifically designed to meet many objectives, including access to the wells.

P-12-11

This comment summarizes comments made above and restates the author's opinion regarding the future use of the site. This opinion will be made available for consideration by the decision-makers as

part of their determination regarding the Proposed Project. The comment does not contain any substantive statements or questions about the Draft EIR or the analysis therein. Therefore, no further response is necessary.